BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

In the Matter of Application No. 2004-1:
Wind Ridge Power Partners, LLC;
Wild Horse Wind Power Project

APPLICANT'S OPENING STATEMENT

INTRODUCTION

Wind Ridge Power Partners, LLC (the Applicant) proposes to construct and operate a wind powered electrical generation facility in Kittitas County, Washington. The Wild Horse Wind Power Project would consist of between 104 and 158 wind turbine generators with a total nameplate capacity of between 158 to 312 megawatts (MW). The project would be located two miles north of the Vantage Highway at Whiskey Dick Mountain, roughly 11 miles east of the City of Kittitas.

On March 9, 2004, the Applicant filed an Application for Site Certification (ASC No. 2004-01) with the Washington State Energy Facility Site Evaluation Council (EFSEC) in accordance with Washington Administrative Code (WAC) 463-42. The Applicant chose to seek certification of this Wild Horse Wind Power Project according to the Revised Code of Washington (RCW) 80.50.060. EFSEC has jurisdiction over the evaluation of major energy facilities including the proposed Project.

PURPOSE OF THE PROJECT

The purpose of the Wild Horse Wind Power Project is to construct and operate a new electrical generation resource using wind energy that will meet a portion of the projected growing regional demands for electricity produced from renewable resources. Recent national and regional forecasts predict increasing consumption of electrical energy will continue into the foreseeable future.

Many regional utilities are currently seeking to acquire new generating resources to meet their loads. More specifically, several regional utilities, including Avista, Puget Sound Energy (PSE), and PacifiCorp have all completed detailed studies and demand forecasts of their own systems as part of their Integrated Resource Plan (IRP) or Least Cost Plan (LCP) processes with oversight from the Washington Utilities and Transportation Commission (WUTC). As a result of their formal IRP or LCP processes, PSE, PacifiCorp and Avista have issued Requests for Proposals (RFPs) specifically for wind power and/or other renewable resources. Avista is seeking to acquire 50 MW, PSE is seeking to acquire at least 150 MW, and PacifiCorp is seeking to acquire 500 MW.

There is a regional demand for wind generated energy that greatly exceeds the existing regional supply.

According to testimony submitted by Tony Usibelli, Director of the Energy Policy Division of the Washington State Department of Community, Trade and Economic Development (CTED), it is the policy of the state of Washington to support the development of wind energy facilities. Guiding Principle #2 of the State Energy Strategy is to "Encourage the development of a balanced, cost-effective and environmentally sound resource portfolio that includes conservation, renewables (e.g., wind, geothermal, hydro, biomass, and solar technologies), and least-cost conventional resources." Mr. Usibelli has stated that the Applicant has proven through evidence to date, that the Wild Horse Wind Power Project will be a reliable, cost-effective, environmentally sound energy resource.

Testimony submitted by consulting meteorologist Ron Nierenberg states that economically viable and developable sites for wind power in Washington State are scarce. Subtle differences in wind speed have a profound effect on the amount of wind energy that can be generated. A difference of a few mph in the average long term wind speed can mean a difference of 30% in wind energy. This difference in wind energy accounts for the difference between a site that is viable versus a site that is not for a wind power project.

In September 2004 Applicant signed a Letter of Intent (LOI) with Puget Sound Energy (PSE) to purchase the Wild Horse Wind Power Project and associated facilities from the Applicant to serve PSE's customers' growing demand for power in both Kittitas County and other parts of PSE's service territory. The Project would thus provide needed electricity for local PSE customers, including those located in Kittitas County.

PROJECT DESCRIPTION

The Project will entail the construction of between 104 and 158 wind turbine generators with a total nameplate capacity of between 158 and 312 MW and associated components. The final selection of the exact type and size of wind turbine to be used for the Project depends on a number of factors including equipment availability at the time of construction. The number of turbines and the resulting nameplate capacity of the Project would depend on the make and model of turbine used. Therefore, to capture a "reasonable range" of potential Project impacts, the following three Project scenarios have been analyzed:

- Lower End Scenario: The lower end scenario represents the Project configuration with the lowest number of turbines erected. For turbines with a nameplate capacity of 3 MW each, up to 104 turbines would be used for a total nameplate capacity of 312 MW.
- Middle Scenario: The middle scenario represents the Project configuration that would be chosen based on current pricing and performance for wind turbine technology

currently on the market. For turbines with a nameplate capacity of 1.5 MW each, 136 turbines would be used for a total nameplate capacity of 204 MW.

- Upper End Scenario: The upper end scenario represents the Project configuration with the highest number of turbines erected. For turbines with a nameplate capacity of 1 MW each, up to 158 turbines would be used for a total nameplate capacity of 158

The Applicant's review and analysis of the impacts covers the range of impacts within each of the three scenarios. The Applicant is asking the Council's permission to construct and install turbines within this defined range.

The facilities, equipment, and features to be installed as part of the Project include:

- approximately 17 miles of new roads,
- improvements to roughly 15 miles of existing roads,
- approximately 27 miles of underground 34.5-kV collection system electrical power lines,
- approximately 2 miles of overhead 34.5-kV collection system electrical power lines,
- one or two step up substations
- one interconnection substation
- visitor kiosk,
- one approximately 5,000-square-foot operations and maintenance facility with associated parking facility up to six permanent meteorological towers.

The Project would be constructed across a land area of approximately 8,600 acres in Kittitas County, although the actual permanent facility footprint would comprise about 165 acres of land. The majority of the Wild Horse Wind Power Project site and the proposed interconnect points lie on privately owned lands. Parts of the Project site are owned by the Washington DNR, upon which the Applicant has secured a long term lease. A portion of the Project site is owned by WDFW and is currently under review for possible lease to the Applicant. The Applicant has obtained an option to purchase the privately held portion of the Project site and options for easements from the landowners necessary for installation and operation of the transmission feeder line and PSE interconnect substation.

IMPACTS OF THE PROJECT

Earth Resources

The EFSEC DEIS found no significant impacts on soil, topography, and geology resulting from construction of the Project.

Vegetation and Wildlife

Implementation of the proposed Project would result in the some minor loss of vegetation through clearing and ground disturbance. This includes permanent removal of

approximately 165 acres of shrub-steppe vegetation in poor to good condition, and temporary disturbance of up to 401 acres. Shrub-steppe habitat impacts have been fully mitigated, in accordance with WDFW guidelines, by the acquisition, enhancement and protection for at least the life of the Project of over 600 acres of suitable, on-site habitat. No federal or state listed rare plants were identified at the Project site The Applicant has agreed to fence this parcel to eliminate livestock grazing, assuming the land ownership and grazing practices of adjacent properties at the time the Project goes into operation requires fencing to remove livestock from this parcel. In addition to the parcel above, the Applicant is proposing to fence several springs within the Project area to eliminate livestock degradation. Fencing used for the mitigation parcel and the springs will be designed to keep livestock out but allow game species to cross. The Applicant intends to coordinate with Washington Department of Fish and Wildlife (WDFW) regarding fence specifications. Further the Applicant has voluntarily committed to enter into a conservation easement regarding the project site, not as mitigation but as a voluntary act of good citizenship and stewardship of the land. This conservation easement shall be consistent with the uses of the land required by a wind power generation facility, and allow the land to be used for wind energy development and associated activities and facilities, pursuant to the commitments and conditions set forth in the EFSEC staff recommendation letter of February 8, 2005, the EFSEC Application for Site Certification and the EFSEC Site Certification.

The only unique species or rare plant that may be impacted by the Project is hedgehog cactus, a Washington State Review list species. Access to the site will be controlled during both construction and operations, which should provide greater protection than is currently afforded to this species. As collection of this species for gardens has been cited as a reason for its decline, if such collection becomes a problem at the Project site, the Applicant will post a sign at the visitors' kiosk indicating that collection of any plants in the Project area is prohibited.

There are a few Class 3 wetlands in the form of seeps and springs within the Project area, however, all Project facilities will be located a considerable distance from them to prevent any impacts to these wetlands. The Project will not disturb any wetland systems at the Project site. There will be no turbines placed within 500 feet of any wetlands which is close to twice the most stringent wetland setback for Class 1 wetlands in the State of Washington.

The Applicant has commissioned extensive studies by qualified biologists of wildlife at the Project site to avoid impacts to sensitive populations. These studies, results of which are included as Exhibit 14 of the ASC, include:

- Habitat mapping;
- Avian use point count surveys;
- Aerial raptor nest surveys;
- Sage grouse surveys;
- Big game surveys;
- Non-avian wildlife surveys;

The results and recommendations of these studies have been incorporated into the proposed design, construction, operation and mitigation for the Project. The proposed design of the Project incorporates numerous features to avoid and/or minimize impacts to plants and wildlife. These features are based on site surveys, experience at other wind power projects, and recommendations from consultants performing studies at the site. Features of the Project that are designed to avoid or minimize impacts to wildlife include the following:

- Avoidance of construction in sensitive areas such as streams, riparian zones, wetlands, forested areas;
- Avoidance of placing wind turbines in prominent saddles along the main Whiskey Dick Ridge to minimize potential impacts to raptors;
- Minimization of new road construction by improving and using existing roads and trails instead of constructing new roads;
- Choice of underground (vs. overhead) electrical collection lines wherever feasible to minimize perching locations and electrocution hazards to birds;
- Choice of turbines with low RPM and use of tubular towers to minimize risk of bird collision with turbine blades and towers;
- Use of bird flight diverters on guyed permanent meteorological towers or use of unguyed permanent meteorological towers to minimize potential for avian collisions with guy wires;
- Equipping all overhead power lines with raptor perch guards to minimize risks to raptors; and
- Spacing of all overhead power line conductors to minimize potential for raptor electrocution.

Temporarily disturbed areas that have been cleared of vegetation will be reseeded with an appropriate mix of native plant species as soon as possible after construction is completed to accelerate the revegetation of these areas and to the prevent spread of noxious weeds. The Applicant will consult with Washington Department of Fish and Wildlife regarding the appropriate seed mixes for the Project area.

The Applicant contends that the project will result in no significant unavoidable adverse impacts to wildlife. The Applicant has mitigated several potentially significant adverse impacts associated with the proposed action during the preliminary design phase of the proposed WHWPP. The DEIS identified possible indirect impacts to big game winter range and big game movements as a potential significant unavoidable adverse impact of the proposed action. However it is anticipated that the mitigation (exclusion of livestock from springs) and elimination of grazing on the mitigation parcel will improve big game habitat. Controlled access and controlled hunting on the site will allow WDFW to properly manage the herds, which should eliminate the potential for creating a refuge for big game and minimize stress to big game in the winter. Further there has been a recent study regarding interactions of elk populations with operating wind farms conducted by David Walter in conjunction with the Rocky Mountain Elk Foundation, the Oklahoma Department of Wildlife Conservation, Nature Works, and the Oklahoma Cooperative Fish and Wildlife Research Unit. The study finds no evidence that operating wind turbines have a significant impact on elk use of the surrounding area.

Sage grouse impacts have been fully analyzed. The impacts of the Project on future breeding and nesting in the Project area is uncertain, but based on available evidence it does not appear to present a significant threat due to a number of factors. At this time, there are no documented active leks within 5 miles of the project area, but infrequent observations of broods suggest nesting may have occurred near the Project site, and a few small, undocumented leks may have existed in the past. However, it is highly uncertain whether a viable breeding population could be established in this area due to other factors (e.g., failure of previous translocations, topography, future land use, no known leks), even without the Project.

The Applicant proposes to develop a post construction monitoring plan for the Project to quantify impacts to avian species and to assess the adequacy of mitigation measures implemented. The monitoring plan will include the following components: 1) fatality monitoring involving standardized carcass searches, scavenger removal trials, searcher efficiency trials, and reporting of incidental fatalities by maintenance personnel and others; and 2) a minimum of one breeding season raptor nest survey of the study area and a 1 mile buffer to locate and monitoring active raptor nests potentially affected by the construction and operation of the Project.

The protocol for the fatality monitoring study will be similar to protocols used at the Vansycle Wind Plant in northeastern Oregon (Erickson *et al.*, 2000) and the Stateline Wind Plant in Washington and Oregon (FPL *et al.*, 2001).

The Applicant proposes that EFSEC convene a Technical Advisory Committee (TAC) to evaluate the mitigation and monitoring program and determine the need for further studies or mitigation measures. The TAC will be composed of representatives from Washington Department of Fish and Wildlife, EFSEC, Kittitas County, local interest groups, Project landowners, and the Applicant. The role of the TAC will be to review results of monitoring studies to evaluate impacts to wildlife and habitat, and address issues that arise regarding wildlife impacts during operation of the Project. The post-construction monitoring plan will be developed in coordination with the TAC.

The Washington State Department of Fish and Wildlife (WDFW) having a mandate to preserve, protect, manage, and perpetuate the state's fish and wildlife resources including habitat, has thoroughly reviewed the project. It has entered into a stipulation that this Project is consistent with the *Wind Project Habitat Mitigation Guidance Document* (WDFW 2003a) and addresses and fully satisfies all WDFW's concerns raised in the testimony provided by WDFW through its Regional Wildlife Biologist. WDFW further stipulated that it is has no issues related the project as it is proposed. This stipulation included a commitment by the applicant to a set of mitigations recommended by EFSEC staff. All of the experts who have examined the wildlife issues (the Applicant's experts, EFSEC independent consultants and WDFW) agreed that there will be no significant unavoidable adverse impacts. Friend of Wildlife and Wind Power may still be raising issues regarding the impact of the Project on the wildlife including potential impacts to

elk and sage grouse. However the sole basis for its assertion lies in the testimony Mr. Robert Kruse who lacks the expertise needed to credibly sustain these allegations.

No impacts on fish habitat or fish species associated with construction and operation of the Wild Horse Wind Power Project are anticipated.

Water Resources

Precipitation could result in surface runoff from Project facilities during Project construction and operation. However, the Project site grading plan and roadway design will incorporate measures in line with the Storm Water Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs) to ensure that surface runoff will infiltrate directly into the surface soils surrounding Project facilities. The EFSEC DEIS has found there would not be a potential for significant impacts from the Project.

Health and Safety

Unlike thermal power plants, wind power projects pose a minimal risk of explosion or fire potential, as there is no need to transport, store or combust fuel to generate power. As with any major construction undertaking, construction of the Project does present some fire risks. Fire risk minimization will be incorporated into Project design, especially with electrical design that complies with the National Electric Code (NEC). The Project site roads act as firebreaks and also allow for quick access of fire trucks and personnel in the event of a grass fire. EFSEC, as well as Ellensburg Rural Fire District #2 will review and approve all plans developed for the Project before they are implemented. The Applicant has entered into a fire protection contract with Ellensburg Rural Fire District #2 . The Fire Protection and Prevention Plan will include specifics regarding range fire prevention and property protection and will be submitted to EFSEC for review and approval prior to commencement of Project construction.

EMF is associated with electric transmission and is not specific to wind power projects. Electromagnetic fields are only ever considered a possible issue when associated with the siting of high voltage (115kV+) overhead transmission lines in close proximity to residences. EMF is generally not an issue related to wind turbines, which have low voltage drop-cables (575 – 690V) contained within steel towers and have a predominately underground collection system also at a low voltage (34.5 kV). For this Project, potential for EMF exposure is very low because the collector lines pass over and through undeveloped land. The high voltage transmission feeder lines have been sited along a path that does not bring them close to nearby residences or developed areas where people spend time.

Petroleum fuels are the only potentially hazardous materials that will be used in any significant quantity during construction of the Project. Fuel and lubricating oils from construction vehicles and equipment and the mineral oil used to fill the substation transformer(s) are the only potential sources for a spill. However, this type of leak should not create a risk to health and safety or the environment because of the limited

quantities of the materials involved. Measures to prevent and contain any accidental spills resulting from this fuel storage and use will be implemented and approved by EFSEC prior to construction. Construction of the Project will not result in the generation of any hazardous wastes in quantities regulated by state or federal law.

Operation of the Project will not result in the generation of regulated quantities of hazardous wastes. As no fuel is burned to power the wind turbine generators, there will be no spent fuel, ash, sludge or other process wastes generated.

Ice throw, tower collapse, shadow flicker and noise are not issues at this project because of the isolation of the project from residences. The closet residence is more than 1.5 mile from the boundary of the project.

Socioeconomics

The effect on population would be small because the projected number of temporary in-migrants for the construction period (125 employees) is small compared to the overall county population (33,362 in 2000); no significant impacts on population are anticipated. Because the Project would not generate additional development, no indirect impacts on population are anticipated.

No adverse impacts are expected to housing because surveys have shown there is an adequate local housing supply available to accommodate Project-related demand for temporary rental housing.

Project construction would result in increased employment in Kittitas County. It is estimated that about 50% of the direct construction employment impact (125 jobs) would occur within Kittitas and Yakima counties, with the remainder distributed among other local economies in the Northwest.

Total direct income generated during the construction phase of the Project is estimated to be $3,783,000. Total direct income consists of personal income in the form of wages, profits, and other income received by workers and business owners, plus income from other sources such as royalty payments to land owners who lease land for the turbines. The direct income impact from Project construction would be a temporary but beneficial effect to the Kittitas County economy.

While the Project is expected to create construction employment, economic impacts are not limited to those directly created jobs. Direct economic impacts produce a ripple effect through an economy in the form of indirect impacts and induced impacts. Indirect and induced impacts represent the second and third stages of job creation, respectively, as a result of any direct activity. The following is an estimate of the direct and indirect income resulting to the County during the construction phase.

Impact Type	Jobs	Total Income
Direct	40	$3,782,000
Indirect	14	$428,000
Induced	28	$580,000
TOTAL	82	$4.790,000

The exact final project cost is not known at this time. It is anticipated that costs will increase prior to construction to perhaps $235 million. This is due primarily to anticipated increases in the cost of steel, fuel and other key materials for construction and the declining value of the U.S. dollar against the Euro (most major wind turbine manufacturers are based in Europe.) Based on a conservative estimated total Project cost of $235 million, the Applicant estimates that the Project will increase the total valuation of real property in Kittitas County by approximately 8%, from $2.5 billion to $2.7 billion. To put this figure in perspective, the 2003 total assessed value of the ten largest taxpayers in Kittitas County combined is approximately $140 million and the largest single taxpayer in Kittitas County is Puget Sound Energy, with an assessed value in 2003 of $32,343,143 (Kittitas County Assessor, Feb. 2003). Therefore, it is anticipated that the Project would be the largest single taxpayer in Kittitas County by a factor of six and would have an assessed value greater than that of all ten of the current largest taxpayers in the County combined. It is expected that the Project will result in both increased revenues for state schools and local public services in the area as well as reduced property tax levy rates for local taxpayers. The largest beneficiaries of the added revenue from the Project would be local and state schools, county government, county roads, and other local services.

There is no credible evidence that the Project will have a negative affect on the property values in the County. The Applicant submitted the REPP study regarding the impact on property values related to wind farms, which find no evidence that wind development had harmed property values within the viewshed (REPP 2003) of wind power facilities. The Applicant submitted testimony of Barton DeLacy who reviewed and analyzed changes in property values throughout Kittitas County over a 6 year period; 4 years, before the announcement of the Kittitas Valley Wind Power Project, and the two years thereafter. Mr. DeLacy found no change in appreciation of property values between those properties which had a view of the wind power projects in Kittitas Valley or were in close proximity thereto. Intervenor Steven Lathrop asserts that the value of his property located 19 miles from the edge of the project will adversely affected. The rebuttal testimony of Applicant's witness Thomas Priestly and the accompanying exhibits clearly show that if there is a visual impact, it is at best barely perceptible. Intervenor Lathrop has provided no credible evidence that the value of his property will be adversely affected by the project. He has merely offered gross speculation in contrast to the study and analysis carried out by the Applicant's witnesses.

Transportation

No adverse impacts to transportation have been identified that cannot be mitigated by the suggestions set out by the Applicant and the EFSEC DEIS. The Applicant has consulted extensively with both Washington State Department of Transportation and Kittitas County Public Works Department to develop adequate transportation mitigation plans.

Air Quality

Operation of the Project will not result in any direct air emissions. The Project will result in positive indirect impacts on regional air quality to the extent that the power generated from the Project displaces power which would otherwise be generated by the combustion of fossil fuels.

During construction, the types of direct impacts to air quality would be typical of those associated with any large construction project. Indirect impacts in the immediate vicinity are not anticipated because the Project is not expected to substantially induce regional growth to the extent that would result in significant changes to offsite air quality.

The primary type of air pollution generated during Project construction would be emissions from vehicle and equipment exhaust, and fugitive dust particles from travel on paved and unpaved surfaces. The fugitive dust particles occur when disturbed soils become airborne. Exhaust emissions and fugitive air emissions from construction sites are exempt from air emission permitting requirements. The Applicant has proposed adequate mitigation measures to minimize fugitive dust impacts.

Visual and Aesthetic

The Applicant carried out an extensive visual and aesthetic impact analysis. This impact analysis was based primarily on the FHWA methodology for determining visual resource change and assessing viewer response to that change (U.S. Department of Transportation 1988). The analysis is focused on evaluating impacts and recommending measures to minimize adverse visual effects. Central to this assessment is an evaluation of representative public viewpoints from which the project would be most visible. To document the visual changes that would occur, visual simulations show the proposed project from six viewpoints selected to be representative of views toward the project from a range of locations. The visual simulations were presented as *before* and *after* images from each of these simulation viewpoints (SVs). They are presented as photos of existing conditions together with the companion simulation images. This provides a clear image of the existing character and quality of the views from each of the SVs, as well as the scale and visual appearance of the changes that would result from the construction of the proposed project.

The Photomontage module of the WindPro software program was used to perform the computer modeling and rendering required to produce the images of the project facilities; these images were superimposed on the photographs to create the simulations. Existing topographic and site data provided the basis for developing an initial digital model. The Applicant provided site plans and digital data for the proposed wind turbines. These datasets were used to create three-dimensional digital models of these facilities. The models were combined with the digital site model to produce a complete computer model of the wind farm. For each viewpoint, viewer location was digitized from topographic maps, using 5 feet as the assumed eye level. The WindPro program overlaid computer "wire frame" perspective plots on the photographs of the views from the SVs to verify scale and viewpoint location. Digital visual simulation images were produced using computer renderings of the three-dimensional model combined with high-resolution digital base photographs.

The visual impact assessment was based on evaluation of the changes to the existing visual resources that would result from construction, operation, and decommissioning of the project. These changes were assessed by comparing the conditions under the simulated views with the conditions of the existing visual environment. Consideration was given to the following factors in determining the extent and implications of the visual changes.

- The specific changes in the affected visual environment's composition, character, and any specially valued qualities.
- The affected visual environment's context.
- The extent to which the affected environment contains places or features that have been designated in plans and policies for protection or special consideration.
- The relative numbers of viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the expected changes. Particular consideration was given to effects on views identified as having high or moderate levels of visual sensitivity.

Levels of impact were classified as *high*, *moderate*, and *low*. In general, high levels of aesthetic impacts were assigned in situations in which turbines would be highly visible from sensitive viewpoints and would alter levels of landscape vividness, unity, and intactness to the extent that there would be a substantial decrease in the existing level of visual quality. Moderate levels of aesthetic impact were assigned in situations in which turbines would be visible in areas with high levels of visual sensitivity and would alter levels of landscape vividness, unity, and intactness to the extent that there would be a moderate change in existing visual quality. Moderate levels of visual impact were also assigned in situations in which the presence of turbines in the view would lead to more substantial changes in visual quality, but where levels of visual sensitivity were moderate to low. Low levels of visual impact were assigned in situations where the project would have relatively small effects on overall levels of landscape vividness, unity, and intactness and/or where existing levels of landscape aesthetic quality are low or where there are low levels of visual sensitivity.

The Applicant's analysis and the DEIS concluded that the visual impact of the project would not constitute significant impacts because of the low to moderate levels of sensitivity of the affected views.

Public Services

Regarding law enforcement there could be additional calls for response during the construction phase, primarily because of increased traffic and associated accident potential. Other law enforcement concerns during construction include construction site security against theft and vandalism. However, because the construction period is short (less than one year), the increased service calls are not anticipated to be sufficient in number to require additional law enforcement staff resources in the Project area. The Applicant will provide its own security.

During Project construction, the local demand for emergency medical services could increase slightly. With adequate safety measures in place, and considering the moderate size of the construction workforce (which would temporarily reach a peak of 160 workers under all three Project scenarios) it is expected that Project construction would generate few serious injury accidents requiring EMS response. Furthermore, the local hospital has capacity for additional patients and there are several ambulances available to service the Project site. Project operation would not have a significant effect on local long-term demands for law enforcement services, fire or emergency services

CUMULATIVE IMPACTS

The DEIS for the Project, as well as those for the Desert Claim and Kittitas Valley Wind Power Project, evaluated the potential cumulative impacts of all three wind power projects proposed in Kittitas County. These analyses were conducted by three different independent consultants (Shapiro and Associated, Huckell/Weinman Associates, and Jones and Stokes, respectively). The results of these analyses all concluded that, with the implementation of the proposed mitigation measures, no significant adverse cumulative impacts are anticipated to any element of the environment as result of the construction and operation of all three proposed projects. The only potential exception is the issue of aesthetic impacts, which are, by definition, subject to the individual preferences and aesthetic tastes of every potentially affected viewer.

ALTERNATIVES

EFSEC conducted an independent analysis of alternative sites in conjunction with the DEIS prepared for the Wild Horse Wind Power Project (EFSEC, 2004). A total of six alternative sites were identified within Kittitas County, which were then screened against five major criteria for siting a wind power project. Two of the six alternatives did not meet the initial screening test. Four alternative sites were brought forward for further analysis. Of these, one was the Kittitas Valley site and another was the enXco Desert

Claim site, which is not available to the Applicant as it is under the control of enXco. The Wild Horse site is not a viable alternative to the Kittitas Valley site as it does not have adequate capacity (in terms of land and transmission) to meet the Applicant's goal of generating approximately 350 to 400 MW (from the Kittitas Valley and Wild Horse sites combined) of wind generated electricity to meet demonstrated regional demand for new renewable energy

The environmental impacts of these projects have been thoroughly evaluated and disclosed in the DEISs for those projects prepared by Kittitas County and EFSEC, respectively. The other two sites analyzed by EFSEC, Swauk Valley Ranch and Springwood Ranch, were evaluated for their suitability. Neither of these sites appears to present a viable alternative to the Wild Horse site. The Swauk Valley Ranch and Springwood Ranch alternatives appear to be capable of generating less than 65 MW of power each, using 1.5 MW turbines, given the constraints of the sites. This is significantly less than the proposed capacity of the Project.

CONCLUSION

The Applicant has demonstrated, and EFSEC's DEIS has confirmed, that the proposed Project will provide a significant quantity of non-polluting, renewable energy to meet growing regional demand. The region's privately owned utilities, and many publicly owned utilities are seeking to add new renewable energy resources, specifically wind power, to their respective portfolios. Unlike sites for fossil fuel burning energy facilities, sites for utility scale wind power projects are very rare in Washington.
Ron Nierenberg, one the country's leading experts in wind energy meteorology, has testified that there are a very limited number of sites (2) in the state of Washington with as much potential capacity as the Project. This site features a unique combination of a commercially viable wind resource, willing landowners, adequate on-site transmission capacity and absence of significant environmental constraints.

The environmental impacts of the Project, and the cumulative impacts of all three wind power projects proposed in Kittitas County, have been thoroughly evaluated and documented in the respective DEISs for each proposed project. Every conceivable issue has been raised, addressed and vetted by multiple third party experts. The results of this exhaustive analysis indicate that the Project will have a beneficial net impact on the regional energy supply, regional air quality, and the local economy. The potential negative impacts of the Project on the environment have been minimized through extensive pre-project analysis, design features, and a comprehensive package of mitigation measures. WDFW has confirmed that the Project will not result in significant adverse impacts to wildlife.